



BEFORE THE ARIZONA CORPORATION CUIVING STURECEIVED 1 AZ CORP COMMISSION 2 COMMISSIONERS DOCKET CONTROL Arizona Corporation Commission DOCKETED TOM FORESE- Chairman 3 2017 APR 17 P 4: 28 **BOB BURNS DOUG LITTLE** APR 17 2017 ANDY TOBIN 5 **BOYD DUNN** DOCKETED BY IM GB 6 IN THE MATTER OF THE APPLICATION OF DOCKET NO. E-01345A-16-0036 ARIZONA PUBLIC SERVICE COMPANY FOR A HEARING TO DETERMINE THE FAIR VALUE OF THE UTILITY PROPERTY OF THE COMPANY FOR RATEMAKING PURPOSES, TO FIX A JUST AND REASONABLE RATE OF RETURN THEREON, TO APPROVE RATE SCHEDULES DESIGNED TO DEVELOP 11 SUCH RETURN. 12 IN THE MATTER OF FUEL AND DOCKET NO. E-01345A-16-0123 13 PURCHASED POWER PROCUREMENT AUDITS FOR ARIZONA PUBLIC SERVICE COMPANY. 15 NOTICE OF FILING STAFF'S REBUTTAL TESTIMONY 16 IN SUPPORT OF THE SETTLEMENT AGREEMENT 17 The Utilities Division ("Staff") of the Arizona Corporation Commission ("Commission") 18 hereby files the Rebuttal Testimony of Ralph C. Smith in Support of the Settlement Agreement, 19 20 regarding the above-captioned Dockets. RESPECTFULLY SUBMITTED this 17th day of April, 2017. 21 22 23 Maureen A. Scott, Senior Staff Counsel 24 Wesley C. Van Cleve, Staff Counsel Charles H. Hains, Staff Counsel 25 Legal Division Arizona Corporation Commission 26 1200 West Washington Street Phoenix, AZ 85007 27 (602) 542-3402 28

On this 17th day of April, 2017, the foregoing document was filed with Docket Control as an Utilities Division Pre-Filed Testimony, and copies of the foregoing were mailed on behalf of the Utilities Division to the following who have not consented to email service. On this date or as soon as possible thereafter, the Commission's eDocket program will automatically email a link to the foregoing to the following who have consented to email service.

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BEFORE THE ARIZONA CORPORATION COMMISSION

TOM FORESE - CHAIRMAN BOB BURNS DOUG LITTLE ANDY TOBIN BOYD DUNN

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR A
HEARING TO DETERMINE THE FAIR VALUE
OF THE UTILITY PROPERTY OF THE
COMPANY FOR RATEMAKING PURPOSES,
TO FIX A JUST AND REASONABLE RATE OF
RETURN THEREON, AND TO APPROVE RATE
SCHEDULES DESIGNED TO DEVELOP
SUCH RETURN

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DOCKET NO. E-01345A-16-0036

IN THE MATTER OF FUEL AND PURCHASED POWER PROCUREMENT AUDITS FOR ARIZONA PUBLIC SERVICE COMPANY DOCKET NO. E-01345A-16-0123

REBUTTAL TESTIMONY

IN SUPPORT OF THE SETTLEMENT AGREEMENT

OF

RALPH C. SMITH

ON BEHALF OF THE

UTILITIES DIVISION

ARIZONA CORPORATION COMMISSION

APRIL 17, 2017

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RCS-2	-R:	Presents a copy of the Tucson Electric Power Company ("TEP") Residential Basic Service tariff, showing that the Basic Service Charge is \$13 per month for single-phase service and \$18 per month for three-phase service.
RCS-3	-R:	Presents a copy of the UNS Electric, Inc. ("UNS") Residential Basic Service tariff, showing that the Basic Service Charge is \$15 per month (i.e., the same rate to which AARP witness, Mr. Coffman, is objecting as a Settlement Agreement rate component for Arizona Public Service Company ("APS")).
RCS-4	-R:	Material Provided by APS for the Third Technical Conference Held on September 29, 2016 Regarding Customer Education

EXECUTIVE SUMMARY ARIZONA PUBLIC SERVICE COMPANY DOCKET NOS. E-01345A-16-0036 AND E-01345A-16-0123

My Rebuttal Testimony in support of the Settlement Agreement responds to AARP witness Coffman's testimony in opposition to the settlement.

1 I. INTRODUCTION 2 Q. Please state your name, position, and business address. 3 A. Ralph C. Smith. I am a Senior Regulatory Consultant at Larkin & Associates, PLLC, 15728 4 Farmington Road, Livonia, Michigan 48154. 5 6 Q. Are you the same Ralph C. Smith who has previously submitted testimony in this 7 proceeding? 8 A. Yes. 9 10 Q. What is the purpose of your Rebuttal Testimony in support of the Settlement 11 Agreement? 12 A. The purpose of my testimony is to respond to issues raised by AARP witness Coffman in 13 opposition to the Settlement Agreement. 14 15 Q. How is your Rebuttal Testimony in support of the Settlement Agreement organized? 16 A. My Rebuttal Testimony responds to the two concerns raised by Mr. Coffman in AARP's 17 opposition to the Settlement Agreement. I first summarize the concerns he has presented in 18 opposition to the settlement. I then respond to each of those two concerns. 19 20 Q. Are there any Attachments to your Rebuttal Testimony in support of the Settlement 21 Agreement? 22 A. Yes, three. Attachment RCS-1-R presents a bill impact analysis. Attachment RCS-2-R 23 presents a copy of the Tucson Electric Power Company ("TEP") Residential Basic Service 24 tariff, showing that the Basic Service Charge is \$13 per month for single-phase service and 25 \$18 per month for three-phase service. Attachment RCS-3-R presents a copy of the UNS

Electric, Inc. ("UNS") Residential Basic Service tariff, showing that the Basic Service Charge

is \$15 per month (i.e., the same rate to which Mr. Coffman is objecting for Arizona Public Service Company ("APS")). Attachment RCS-4-R contains materials provided by APS from the third technical conference, held on September 29, 2016, describing in detail APS's planned customer education program related to the new residential rate design.

II. RESPONSE TO AARP WITNESS COFFMAN

Q. Has AARP acknowledged that the settlement process allowed for a thorough and comprehensive discussion of all major issues and is beneficial to APS's customers in many respects?

A. Yes. At page 3 of his testimony in opposition to the settlement, Mr. Coffman states that:

The settlement process allowed for a thorough and comprehensive discussion of all major issues. AARP is extremely pleased about many aspects of the Settlement Agreement, including the fact that it would not impose mandatory demand rates upon current residential customers, as originally proposed by the Company.

Q. Why has AARP opposed the Settlement Agreement?

 A. But for two issues, apparently AARP would have joined the Settlement Agreement. AARP has taken issue with two aspects of the Settlement Agreement, paragraphs 17.2 and 19.1.

Mr. Coffman's testimony in opposition to the Settlement Agreement at pages 3-4 opposes the basic charge component of the residential rate provided for in paragraph 17.2. He states that:

In the proposed settlement, APS would increase the fixed "basic service charge" (BSC) to \$ 15.00 on the monthly bills for customers on a basic flat rate billing plan who have an average of between 800 kWh and 1,000 kWh of electricity per month (a rate tariff that is to be designated "R-Basic") [footnote: Settlement Agreement, p. 17, Subsection 17.2.]. This would amount to an 87.5% increase from the \$8.00 that most residential customers on a basic plan now pay in terms of a flat monthly fixed charge. This sharp increase would create fixed charges for those customers that are among the highest in the state, higher than similar customers must pay under the most recent

¹ Per page 3 of Mr. Coffman's testimony: "two issues ultimately prevent AARP from being a signatory to the Settlement Agreement."

Basic Service Charge

A.

Arizona Commission decisions changing rates for UNS and for TEP (i.e., \$13.00 per month).

He recommends (at page 4) that the Settlement Agreement be revised to have a fixed charge of \$10 or no more than \$13:

AARP is asking that the Commission amend Subsection 17.2 of the Settlement Agreement, by insisting upon a reduction in the proposed \$15.00 fixed charge for the vast majority of R-Basic customers who use between 800 kWh - 1,000 kWh of electricity per month. AARP would prefer that this group of R-Basic customers pay \$10.00 monthly, but no more than \$13.00 monthly.

Mr. Coffman is also opposed to the provision in Subsection 19.1 of the Settlement Agreement that applies to "new customers or customers on another rate" under which new customers would be denied the ability to initially choose Basic rate plans after May 1, 2018. Among other things, he claims (at page 6) that: "Subsection 19.1 would create a policy of discriminatory treatment towards new customers and would also come with a high barrier for switching to a Basic rate later. It would likely be confusing and frustrating for the affected customers, creating the need for considerable customer education to make the 'opt out' procedure more understandable." He recommends that new customers should not be forced to have a 90-day trial on an initial rate plan before having the opportunity to choose a different rate.

Q. Mr. Coffman refers to an 87.5 percent increase. Is that the proper way to measure customer bill impacts?

No. He focuses only on the basic service charge and ignores other components of the customer bill, which is not a complete approach to evaluating customer bill impacts.

Attachment CAM-15D to APS witness Meisner's Direct Testimony in Support of the Settlement Agreement shows bill impacts for typical residential customers of 3.87 percent.

The Settlement Agreement at page 6, paragraph 1.59(b) indicates that there would be an average 4.54 percent impact for residential customers, compared to an average 7.96 percent impact under APS's original application. These overall residential bill impacts are far below the percentage increased upon which Mr. Coffman has focused. Focusing on only one component of residential electric bills and ignoring the remaining components can be misleading.

- Q. Are you presenting additional information on residential customer bill impacts to address the implication raised by AARP witness Coffman that the Settlement Agreement would result in unreasonable percentage increases to the bills of typical APS residential customers?
- A. Yes. An evaluation of customer bill impacts reveals that the impact is in the range of \$110.61 on Transition Rate E-12 to \$110.74 on Rate R-Basic and \$111.56 on Rate TOU-E for a customer using 773 kWh per month. For a customer using 950 kWh per month, the settlement rates are in the range of \$139.22 on Transition Rate E-12 to \$132.48 on Rate R-Basic and \$134.21 on Rate TOU-E. Corresponding R-2 and R-3 rates for a customer using 773 kWh and 950 kWh are also shown in the following table:

Settlement Rates - Comparison of Residential Customer Monthly Bill Impacts

Transition E-12, R-Basic, and Other TOU and Demand Rates Monthly Bills by monthly kWh

Avg	Transition					Best
<u>kWh</u>	E-12	R-Basic	TOU-E	<u>R-2</u>	<u>R-3</u>	Rate
773	110.61	110.74	111.56	114.75	121.93	R-Basic
950	139.22	132.48	134.21	136.65	144.66	R-Basic

Notes:

1. Bills include base rates; excludes adjustor rates and taxes.

- 2. Represents typical kW demand and on-peak consumption for each usage level.
- 3. Does not reflect additional bill savings from TOU-E, R-2, and R-3 through changes in usage, such as shifting kWh to off-peak hours or reducing on-peak kW

The customer bill impact analysis is also shown in additional detail in Attachment RCS-1-R to my Rebuttal Testimony.

- Q. What are some of the important facts to be gleaned from the residential customer bill impact comparison?
- A. Some of the important facts to be gleaned from the customer bill impact comparison include the following:
 - The change in the Basic Service Charge from \$8 to \$15 does not result in a \$7 increase in rates for the average residential customer.
 - The TOU-E option is virtually equivalent to the R-Basic option, resulting in a slightly higher bill at 773 kWh per month and a lower bill at 950 kWh per month.
 - Any change in behavior or consumption could result in greater savings.
- Q. Mr. Coffman references the basic service charges of TEP and UNS Electric and claims that the APS basic service charge of \$15 per typical month "would create fixed charges for those customers that are among the highest in the state, higher than similar customers must pay under the most recent Arizona Commission decisions changing rates for UNS and for TEP (i.e., \$13.00 per month)." Please respond.
- A. A review of TEP's Residential Basic Service Tariff, contained in Attachment RCS-2-R shows that the Basic Service Charge is \$13 per month for single-phase service and \$18 per month for three-phase service. Attachment RCS-3-R presents a copy of the UNS Residential Basic Service tariff, which shows that the Basic Service Charge is \$15 per month. Thus, Mr. Coffman's statements appear to be incorrect with respect to the UNS basic service charge of

objecting for APS.

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Q. At page 4, Mr. Coffman states that: "AARP believes that residential customers should be able to choose a plan that does not put an unreasonable amount of the rate recovery into a fixed charge, as opposed to basing more cost recovery upon individual household consumption." Has Mr. Coffman shown that a basic service charge of \$15 per month is unreasonable?

\$15 per month, which is the same \$15 per month BSC rate to which Mr. Coffman is

- A. No. To my knowledge he has presented no evidence that a basic service charge of \$15 is unreasonable or is not supported by and reasonably related to the cost of providing service.
- Q. Do other APS residential rate plans offer a lower fixed charge?
- A. Yes. The TOU-E, for example, has a basic service charge of \$13 per month.²
- Q. AARP witness Coffman claims at page 4 that: "Charging too much in the BSC for residential consumers limits the ability of those customers to control their monthly bills and reduces the incentive for energy efficiency and energy conservation measures." Please respond.
- A. Under the Settlement Agreement, residential customers are presented with a range of optional rate plans, including a flat rate, a time-of-use (TOU) energy rate, and two TOU demand rates. Customers who desire a lower BSC and enhanced incentives for energy efficiency and energy conservation measures can choose a rate such as R-TOU-E.

² APS's Basic Service Charges are charged on a per-day basis. The equivalent amount is for a typical month.

Q. Is the basic service charge for residential rates that is provided for in the Settlement Agreement reasonable?

A. Yes. The residential basic service charge provided for in the Settlement Agreement is reasonable. The \$15 reflects the compromise settlement of complex issues among a wide range of parties, including parties such as Residential Utility Consumer Office ("RUCO") who are charged with representing the interests of residential customers. As noted above, the \$15 per month BSC in the Settlement Agreement is also comparable to the UNS basic service charge of \$15 per month, which is shown in Attachment RCS-3-R.

Paragraph 19.1, 90-Day New Customer Trial of TOU or Demand-Based Rates

Q. Why was paragraph 19.1 included in the Settlement Agreement?

A. Paragraph 19.1 entitled "Residential Rate Availability" was included in the Settlement Agreement as part of the overall compromise on issues related to changes to rate design options for APS. It allows customers to select the plan of their choice to the extent they qualify until May 18, 2018, unless they are grandfathered under another section of the Agreement. New customers after May 1, 2018, may choose TOU-E, R-2, R-3 or if they qualify R-XS or R-Tech. After 90 days, new customers may opt-out of their current rate and select R-Basic if they qualify. Without 90 days of usage data, the new customer will not have adequate information to make an informed decision regarding the rate plan.

Q. Do residential customers of APS continue to have choices among rate plans?

A. Yes. Residential customers will have choices for a flat rate, a time-of-use (TOU) energy rate, and two TOU demand rates. All rate choices will be voluntary, although after May 1, 2018, as provided for in paragraph 19.1 of the Settlement Agreement, new APS residential customers are required to give either TOU or demand-based rates a 90-day trial before switching to a flat rate plan (excluding customers that qualify for rate R-XS).

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Q. Is the requirement in paragraph 19.1 improperly "discriminatory" as claimed by AARP?

A. No. Since it would apply to all new APS residential customers (excluding customers that qualify for rate R-XS), Staff views this provision as being a reasonable way to implement the new rate design. It is fairly common in utility rate design to have different rate provisions apply to new customers. Grandfathering and having frozen rate structures for existing customers has been used historically in the evolving rate design for Arizona electric utilities. Having rate distinctions between existing and new customers is not inherently improper and can be a reasonable way of implementing modern utility rate design that is a better reflection of cost causation.

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Q. Would paragraph 19.1 create a "high barrier" (as claimed by AARP witness Coffman) for switching to a Basic rate later?

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A.

I don't believe so. Paragraph 19.1 does not appear to impose any barrier for switching to a Basic rate after the initial 90-day trial period.

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Q. Is customer education needed concerning the new rates?

19 20 21 A. Yes. APS has indicated that it would be conducting an extensive customer education effort. See, e.g., the material from APS's third technical conference held Thursday, September 29th, 2016, attached for ease of reference as Attachment RCS-4-R.

1 Q. Should new customers who are initially placed onto a TOU or demand rate be 2 notified about their option to switch? 3 A. Yes. Staff believes there would be merit in having APS notify the customers near the end of the 90-day trial period about the option to switch to another rate. Ideally, such notification 5 would be accompanied with information on the estimated bill impact of switching. 6 7 Q. Does Staff agree with AARP's position that the Settlement Agreement is unreasonable unless paragraph 19.1 is revised to eliminate the 90-day trial period? 8 9 A. No. Staff's position is that the Settlement Agreement taken as a whole is reasonable and in 10 the public interest. 11 12 Does this conclude your Rebuttal Testimony in support of the Settlement Agreement? Q.

13

A.

Yes, it does.

Arizona Public Service Company Settlement Rates Comparison of Residential Customer Bill Impacts Transition E-12, R-Basic, and Other TOU and Demand Rates Monthly Bills by monthly kWh

Line No.	Avg <u>kWh</u>	Transition <u>E-12</u>	R-Basic	TOU-E	<u>R-2</u>	<u>R-3</u>	Best Rate
	I. Estimated	Monthly Bi	lls				
1	773	\$ 110.61	\$ 110.74	\$ 111.56	\$ 114.75	\$ 121.93	R-Basic
2	950	\$ 139.22	\$ 132.48	\$ 134.21	\$ 136.65	\$ 144.66	R-Basic
	II. Dollar D	ifference Nev	w Rate Compa	ared with T	ransition R	ate E-12	
	Avg. kWh	E-12	R-Basic	TOU-E	<u>R-2</u>	<u>R-3</u>	
3	773		\$ 0.13	\$ 0.95	\$ 4.14	\$ 11.32	
4	950		\$ (6.74)	\$ (5.01)	\$ (2.57)	\$ 5.44	
		rease (Decre	ase) New Rate	Compared			-12
	Avg. kWh	<u>E-12</u>	R-Basic	TOU-E	<u>R-2</u>	<u>R-3</u>	
5	773		0.12%	0.86%	3.74%	10.23%	
6	950		-4.84%	-3.60%	-1.85%	3.91%	

Notes

- 1. Bills include base rates; excludes adjustor rates and taxes.
- 2. Represents typical kW demand and on-peak consumption for each usage level.
- 3. Does not reflect additional bill savings from TOU-E, R-2, and R-3 through changes in usage, such as shifting kWh to off-peak hours or reducing on-peak kW

Attachment RCS-2-R

Copy of the Tucson Electric Power Company ("TEP")
Residential Basic Service tariff,
showing that the Basic Service Charge is
\$13 per month for single-phase service and
\$18 per month for three-phase service



Tucson Electric Power Company

Original Sheet No.:	101
Superseding:	

Residential Service Basic

AVAILABILITY

Available throughout the Company's entire electric service area where the facilities of the Company are of adequate capacity and are adjacent to the premises.

APPLICABILITY

To all single-phase or three-phase residential electric service (subject to availability at point of delivery) in individual private dwellings and individually metered apartments when all service is supplied at one point of delivery and energy is metered through one meter.

For those dwellings and apartments where electric service has historically been measured through two meters, when one of the meters was installed pursuant to the Residential Electric Water Heating Service Rate (R-02F) which is no longer in effect, the electric service measured by such meters shall be combined for billing purposes.

Separately metered buildings (such as garages and or wells) that are on the same lot as a residential area will be classified as non-residential and the appropriate general service rate will be applied.

Not applicable to resale, breakdown, temporary, standby, auxiliary service, or service to electrical equipment that causes excessive voltage fluctuations.

Customers may switch between applicable rate tariffs once in a rolling twelve month period.

CHARACTER OF SERVICE

The service shall be single-phase or three-phase, 60 Hertz, and at one standard nominal voltage as mutually agreed and subject to availability at point of delivery.

RATE

A monthly bill at the following rate plus any adjustments incorporated herein:

BUNDLED STANDARD OFFER SERVICE - SUMMARY OF BASIC SERVICE AND ENERGY CHARGES

Basic Service Charge, Single-phase service, per month \$13.00
Basic Service Charge, Three-phase service, per month \$18.00

Energy Charges (\$/kWh):

0 – 500 \$0.066152 501- 1000 \$0.081152 Over 1000 \$0.086652

Energy Charge is a bundled charge that includes: Local Delivery-Energy (Local Delivery and/or Distribution exclusive of Transmission/Ancillaries), Generation Capacity, Fixed Must-Run, Transmission and Ancillary Services.

Filed By:

Kentton C. Grant

Title: District: Vice President, Rates and Planning

Entire Electric Service Area

Rate:

TRRES

Effective:

February 27, 2017

Decision No.:

Tucson Electric Power

Tucson Electric Power Company

Original Sheet No.:	101 - 1
Superseding:	

Power Supply Charge (\$/kWh):

Summer (May - September)

Winter (October - April)

Base Power

\$0.035861

\$0.032515

Purchased Power and Fuel Adjustment Clause (PPFAC): The Base Power Supply Charge shall be subject to a per kWh adjustment in accordance with Rider-1 to reflect any increase or decrease in the cost to the Company for energy either generated or purchased above or below the base cost of purchased power and fuel.

MONTHLY LIFELINE DISCOUNT:

For current and new eligible Lifeline customers taking service hereunder, the monthly bill shall be in accordance to the rate above except that a discount of \$15.00 per month shall be applied.

New customers, including those who move, are no longer eligible for the discounts in the table below. For current Lifeline customers formerly taking service under one of the following discontinued rates, the monthly bill shall be in accordance to the rate above except the discount per month shall be applied as follows:

	Discount
Residential Lifeline/Senior R-04-01F	\$30
Residential Lifeline Service R-06-01F	\$18
Residential Lifeline Medical R-08-01F	\$40

For all customers, no Lifeline discount will be applied that will reduce the bill to less than zero.

LIFELINE ELIGIBILITY

- 1. The TEP account must be in the Customer's name applying for a Lifeline discount.
- 2. Applicant must be a TEP residential customer residing at the premise.
- 3. Applicant must have a combined household income at or below 150% of the federal poverty level. See Income Guidelines Chart on TEP's website at www.tep.com or contact a TEP customer care representative.

DIRECT ACCESS

A Customer's Direct Access bill will include all unbundled components except those services provided by a qualified third party. Those services may include Metering (Installation, Maintenance and/or Equipment), Meter Reading, Billing and Collection, Transmission and Generation. If any of these services are not available from a third party supplier and must be obtained from the Company, the rates for Unbundled Components set forth in this tariff will be applied to the customer's bill.

FOR DIRECT ACCESS: ARIZONA INDEPENDENT SCHEDULING ADMINISTRATOR (AZISA) CHARGE A charge per kWh shall, subject to FERC authorization, be applied for costs associated with the implementation of the AZISA in Arizona.

Filed By:

Kentton C. Grant

Title:

Vice President, Rates and Planning

Rate:

TRRES

District:

Entire Electric Service Area

Effective:

February 27, 2017

Decision No.:



Tucson Electric Power Company

Original Sheet No.:	101 - 2
Superseding:	

TEP STATEMENT OF CHARGES

For all additional charges and assessments approved by the Arizona Corporation Commission see the TEP Statement of Charges which is available on TEP's website at www.tep.com.

TAX CLAUSE

To the charges computed under the above rate, including any adjustments, shall be added the applicable proportionate part of any taxes or governmental impositions which are or may in the future be assessed on the basis of gross revenues of the Company and/or the price or revenue from the electric energy or service sold and/or the volume of energy generated or purchased for sale and/or sold hereunder.

RULES AND REGULATIONS

The standard Rules and Regulations of the Company as on file with the Arizona Corporation Commission shall apply where not inconsistent with this rate.

ADDITIONAL NOTES

Additional charges may be directly assigned to a customer based on the type of facilities (e.g., metering) dedicated to the customer or pursuant to the customer's contract, if applicable. Additional or alternate Direct Access charges may be assessed pursuant to any Direct Access fee schedule authorized.

Filed By:

Kentton C. Grant

Title:

Vice President, Rates and Planning

District:

Entire Electric Service Area

Rate:

TRRES

Effective:

February 27, 2017

Decision No.:



Tucson Electric Power Company

Three-Phase

Original Sheet No.:	101 - 3
Superseding:	

BUNDLED STANDARD OFFER SERVICE CONSISTS OF THE FOLLOWING UNBUNDLED COMPONENTS:

Basic Service Charge Components	s (Unbundled):	
Description:	Single-Phase	
Meter Services	\$1.42	

\$6.42 \$0.27 Meter Reading \$0.27 Billing & Collection \$3.32 \$3.32 Customer Delivery \$7.99 \$7.99

\$18.00 Total \$13.00

Energy Charge Components (per kWh) (Unbundled):

Local Delivery

0 - 500\$0.016609 501-1000 \$0.031609 Over 1000 \$0.037109 **Generation Capacity** \$0.031960 Fixed Must Run \$0.006710 Transmission \$0.008483 System Control & Dispatch \$0.000120 Reactive Supply and Voltage Control \$0.000450 Regulation and Frequency Response \$0.000440 Spinning Reserve Service \$0.001190 Supplemental Reserve Service \$0.000190

Energy Imbalance Service: Currently charged pursuant to the Company's OATT

Summer Power Supply Charges (per kWh):

(May - September) \$0.035861 **Base Power Component**

PPFAC In accordance with Rider 1 (October - April)

\$0.032515

Winter

Filed By:

Kentton C. Grant

Title: Vice President, Rates and Planning District:

Entire Electric Service Area

Rate:

TRRES

Effective:

February 27, 2017

Decision No.:

Attachment RCS-3-R

A copy of the UNS Electric, Inc.
Residential Basic Service tariff,
showing that the Basic Service Charge is \$15 per month
(i.e., the same rate to which AARP witness, Mr. Coffman, is
objecting as a Settlement Agreement rate component for
Arizona Public Service Company)



UNS Electric, Inc.

Original Sheet No.:	101
Superseding:	27 14

Residential Service

AVAILABILITY

Available throughout the Company's entire electric service area where the facilities of the Company are of adequate capacity and are adjacent to the premises.

APPLICABILITY

To all single-phase (subject to availability at point of delivery) residential electric service in individual private dwellings and individually metered apartments when all service is supplied at one point of delivery and energy is metered through one meter.

Not applicable to resale, breakdown, temporary, standby, auxiliary service, or service to electrical equipment that causes excessive voltage fluctuations.

CHARACTER OF SERVICE

The service shall be single-phase, 60 Hertz, and at one standard nominal voltage as mutually agreed and subject to availability at point of delivery.

RATE

A monthly bill at the following rate plus any adjustments incorporated herein:

BUNDLED STANDARD OFFER SERVICE - SUMMARY OF BASIC SERVICE AND ENERGY CHARGES

Basic Service Charge

\$15.00 per month

Energy Charges (per kWh):

	Delivery Consises Energy	Power Supply	Charges ²	Tatal3
	Delivery Services-Energy ¹	Base Power	PPFAC ²	Total ³
0 - 400 kWh	\$0.030010	\$0.055820	Varies	\$0.085830
Over 400 kWh	\$0.042240	\$0.055820	Varies	\$0.098060

- Delivery Services-Energy is a bundled charge that includes: Local Delivery, Generation Capacity and Transmission.
- The Power Supply Charge shall be comprised of the Base Power Charge and the Purchased Power and Fuel
 Adjustment Clause (PPFAC), a per kWh adjustment in accordance with Rider-1. The PPFAC reflects increases or
 decreases in the cost to the Company for energy either generated or purchased above or below the base cost per
 kWh sold. Please see Rider-1 for current rate.
- Total is calculated above for illustrative purposes, and excludes PPFAC, because the PPFAC changes monthly pursuant to Rider-1 PPFAC. While only non-variable components are included in the illustration above, a Customer's actual bill in any given billing month will reflect the applicable PPFAC for that billing month.

Filed By:

Kentton C. Grant

Title:

Vice President

District:

Entire Electric Service Area

Rate:

ERRES

Effective:

August 22, 2016

Decision No:



UNS Electric, Inc.

Original Sheet No.:	101-1
Superseding:	

MONTHLY CUSTOMER ASSISTANCE RESIDENTIAL ENERGY SUPPORT (CARES) DISCOUNT:

For current and new eligible CARES customers taking service under the Residential Service tariff, the monthly bill shall be in accordance to the rate above except that a discount of \$16.00 per month shall be applied.

For current CARES customers who were previously taking service under the CARES Medical Frozen (CARES-MF) tariff, the monthly bill shall be in accordance to the rate above except that a discount of \$28.00 per month shall be applied. New customers, including those who move are no longer eligible for the CARES Medical discount.

For all customers, no CARES discount will be applied that will reduce the bill to less than zero.

CARES ELIGIBILITY

- The UNS Electric account must be in the Customer's name applying for a CARES discount.
- 2. Applicant must be a UNS Electric residential Customer residing at the premise.
- Applicant must have a combined household income at or below 150% of the federal poverty level. See Income Guidelines Chart on UNS Electric's website at www.uesaz.com or contact a UNS Electric customer care representative.

DIRECT ACCESS

A Customer's Direct Access bill will include all unbundled components except those services provided by a qualified third party. Those services may include Metering (Installation, Maintenance and/or Equipment), Meter Reading, Billing and Collection, Transmission and Generation. If any of these services are not available from a third party supplier and must be obtained from the Company, the rates for Unbundled Components set forth in this Tariff will be applied to the Customer's bill.

UNS ELECTRIC STATEMENT OF CHARGES

For all additional charges and assessments approved by the Arizona Corporation Commission see the UNS Electric Statement of Charges which is available on UNS Electric's website at www.uesaz.com.

TAX CLAUSE

To the charges computed under the above rate, including any adjustments, shall be added the applicable proportionate part of any taxes or governmental impositions which are or may in the future be assessed on the basis of gross revenues of the Company and/or the price or revenue from the electric energy or service sold and/or the volume of energy generated or purchased for sale and/or sold hereunder.

RULES AND REGULATIONS

The standard Rules and Regulations of the Company as on file with the Arizona Corporation Commission shall apply where not inconsistent with this rate.

BUNDLED STANDARD OFFER SERVICE CONSISTS OF THE FOLLOWING UNBUNDLED COMPONENTS:

Basic Service Charge Components (Unbundled):

Description	1137	
Meter Services	\$ 1.00 per month	
Meter Reading	\$ 1.58 per month	
Billing & Collection	\$ 4.37 per month	1750
Customer Delivery	\$ 8.05 per month	
Total	\$15.00 per month	

Filed By:

Kentton C. Grant

Title:

Vice President

District:

Entire Electric Service Area

Rate:

ERRES

Effective:

August 22, 2016

Decision No:



UNS Electric, Inc.

Original Sheet No.:	101-2
Superseding:	

Energy Charge Components (per kWh) (Unbundled):

Local Delivery	
0 – 400 kWh	\$0.000810
Over 400 kWh	\$0.013040
Generation Capacity	\$0.018500
Transmission	\$0.010700

Power Supply Charges (per kWh):

Component	
Base Power Supply	\$0.055820
PPFAC (see Rider-1 for current rate)	Varies

Filed By:

Kentton C. Grant

Title:

Vice President

District:

Entire Electric Service Area

Rate:

ERRES

Effective:

August 22, 2016

Decision No:

Attachment RCS-4-R Material Provided by APS for the Third Technical Conference Held on September 29, 2016 On Customer Education

APS Rate Case Technica Conferen

September 29, 2016





Agenda

- Introduction
- Residential Customer Outreach and Rate **Transition Plan**
- Rate Design-Overview of Residential Rates and Changes

Residential Customer Outreach and Rate Transition Plan





Overview

- Current rate plan success
- Creating a customer-centric plan
- Objectives and Education/outreach framework
- Customer touchpoints, tools and community outreach
- Customer engagement factors
- 3 phases of outreach
- Awareness
- Transition
- Transition and Beyond
- Summary



Proposed rates overview

	Basic Service Charge (per month)	Demand Charge (\$/kw)**	Summer Energy Charge (On/Off Peak \$/kWh)	Winter Energy Charge (On/Off Peak \$/kWh.)
Extra Small*	\$18	None	\$0.10324	\$0.10324
R-1	\$24	\$6.60/kW	\$0.1516/\$0.08070	\$0.12730/\$0.08070
R-2	\$14.50	\$8.40/kW	\$0.1516/\$0.0808	\$0.12730/\$0.0808
R-3	\$24	\$16.40/kW summer \$11.50/kW winter	\$0.0909/\$0.05475	\$0.06670/\$0.05475



Core message - shift, stagger, save

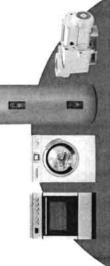
3 ways to save during on-peak hours (3pm-8pm on weekdays)



shift

usage from on-peak to off-peak

For example, set your dishwasher to run on a delay cycle, run your pool pump at night or do your laundry on the weekend.



stagger

the use of major appliances

Avoid running major appliances at the same time during on-peak hours. For example, start your laundry after you cook dinner.



save

with tips and tools

For example, turn off ceiling fans when leaving a room, switch to LEDs, and get customized savings tips by taking our online Energy Analyzer survey.



Experience – not starting from zero

~1 million Residential customers

Our Customers...

Opportunity... Save

~480k Standard customers

conservation)

(through

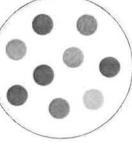
~450k **Time of use** customers

Shift & Save

~120k Time of use with demand customers

Shift, Stagger & Save

> ~260 thousand Residential **x-small** customers



Create a transition strategy based on experience from our current customers

Determine:

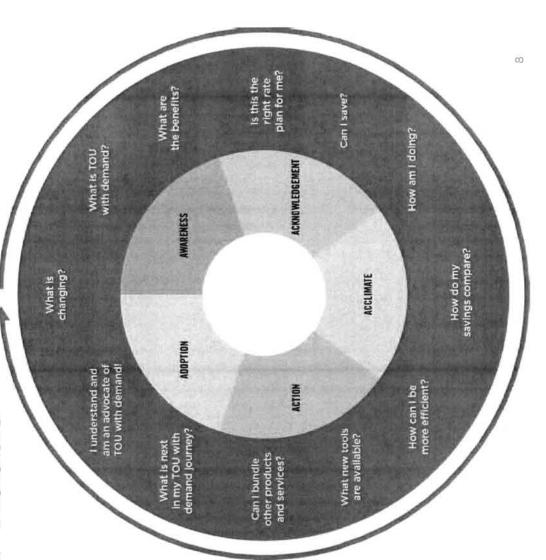
- Messaging strategies for Shift, Stagger and Save
 - Touchpoint frequency



Building an education and outreach plan around the customer needs

Education & outreach objectives:

- Drive awareness across all communications channels
- Acclimate / familiarize customers with Shift, Stagger and Save
- Create a call to action, getting customers to visit aps.com demand page and become familiar with their demand
- Increase adoption of APS tools and programs to facilitate demand awareness and control





Customer touchpoints

A touchpoint is a measureable customer interaction

Touchpoints can include messaging, communications, tools and live interactions

Touchpoints help to:

- · Create awareness to a change
- Assist a customer in managing energy and lowering their bill
- = millions of customer touchpoints per year

Transition and Beyond Transition **Awareness**



Digital platforms to support customer education

Customer-friendly, easy-to-navigate demand webpage:

- aps.com demand webpage, launching this fall
- Easy access to information regarding customer demand questions and quick tips
 Robust webpage with personalized education tools

Arizona energy initiatives:

- AZenergyfuture.com website Detailed information relevant
- to Arizona's energy future and rate reviews Intended for stakeholders and

highly engaged customers





Digital tools to help customers manage usage

APS mobile app

Create transparency in current and historical usage and demand information

Notifications and alerts center

- Alert customers via text and email set to their threshold preferences
- Overall energy usage
- Peak usage alert
- Payment alert
- Outages reported



APS mobile app demo



Mobile phone app and notifications



Customer's peak usage graph



Mobile app interface



Awareness through community outreach



APS is engaged in the community through...

Community outreach

Delivered over 50 presentations to various organizations and communities across Arizona

Customer open house events

- Held events in Sun City, Flagstaff, Payson
- Expect at least 10 additional events to be held throughout Arizona prior to transition. Casa Grande and Pebble Creek scheduled for this year.

Home shows and community events

Approximately 130 events scheduled to provide awareness



Customer usage insights

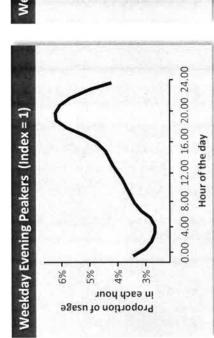
Weekday Daytimers (Index = 4)

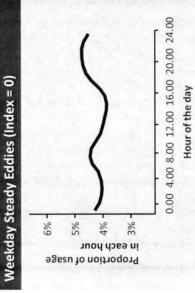
Recognize it is important to know our customer profiles in order to create tailored messaging

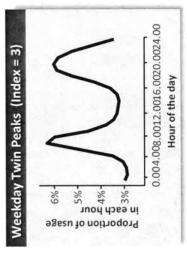
0.001.008.0012.0016.0020.0024.00

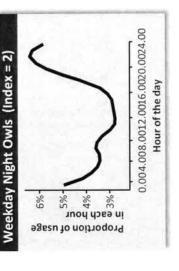
Proportion of usage in each hour 3% - % Hour of the day

Understand who they are, how they use our product and how best to communicate to them





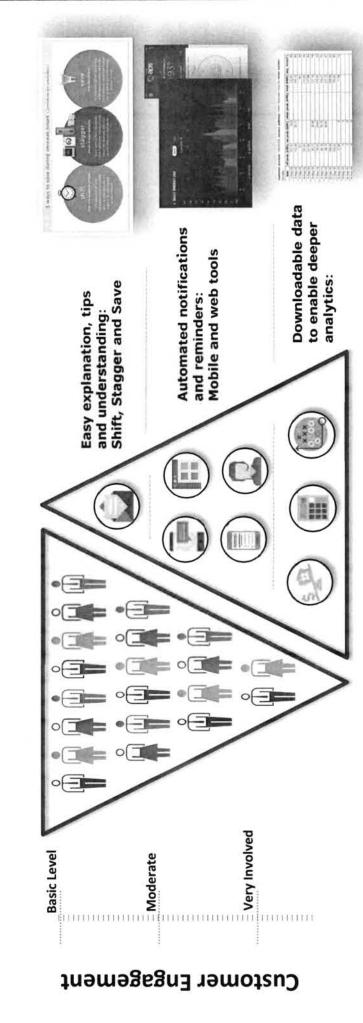




Graphs: 5 load profile types for APS residential customers



Customers level of engagement



Give customers the option to receive their preferred level of information regarding their new rate Create a plan that addresses all types of customers and their individual engagement preference plans and tips to save



Voice of the customer





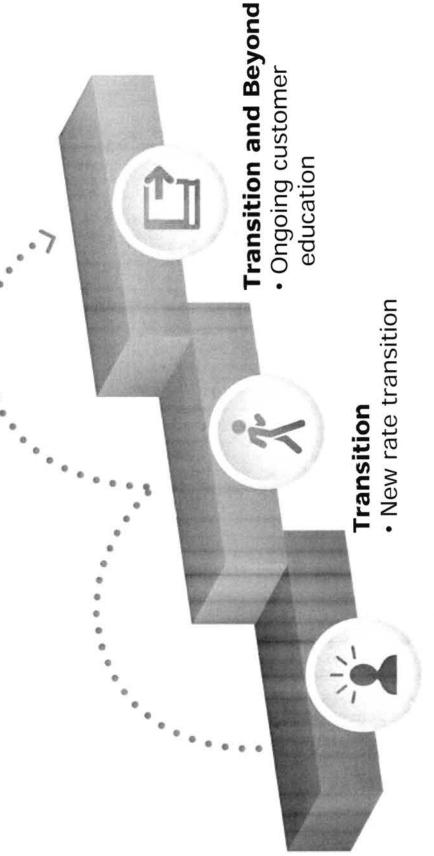








Phases tied to the customer journey and overall transition



Awareness

Pre-decision





AWARENESS

Pre-decision





sde (

Awareness phase

Phase objectives:

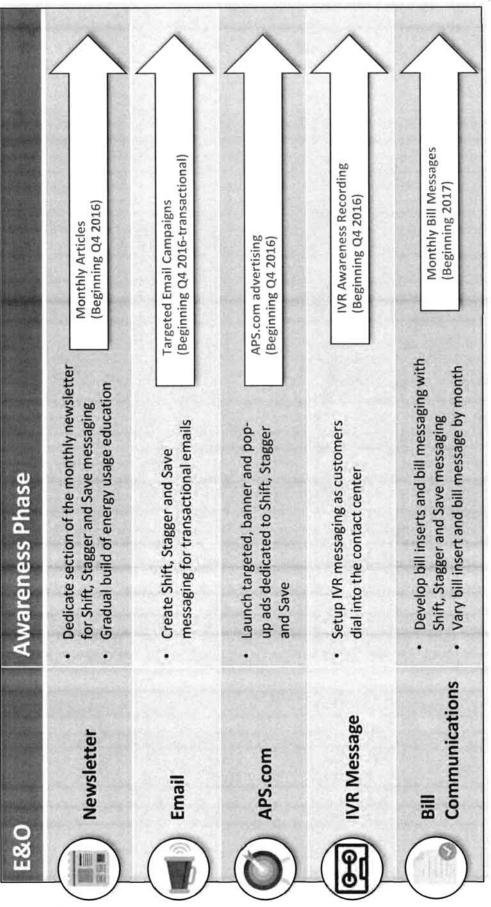
- Educate customers on energy usage prior to the rate transition
- Build familiarity of Shift, Stagger and Save messaging and drive awareness of which household appliances use the most energy
- Inform the communities we serve through outreach
- Encourage adoption of APS tools and programs through marketing and advertising







Awareness phase - education and outreach









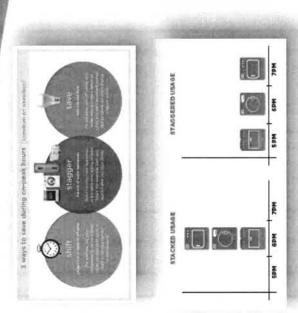
Demand education



Shift, Stagger and Save: appliance usage

1318

7.5 840



Shift, Stagger and Save: how to stagger



Alerts and notification campaign



Mobile app campaign



Your Energy, Your Options campaign



Transition

New rate transition







Transition phase

Phase objectives:

- Inform customers of transition details
- Notice of upcoming change and best rate analysis
- Reinforce Shift, Stagger and Save messaging, while providing additional tips to stagger and become familiar with their new rate plan
- Welcoming communication via smart video and/or mailer
- Leverage segmentation to effectively communicate
- Ensure business readiness—people, process, systems and technology
- Execute rate transition



Sample welcome kit





Transition phase - education and outreach

E&0	0	Transition Phase
	Awareness Phase	 Continue education and outreach efforts from the awareness phase with adjusted messaging to fit transition phase Newsletter, Bill Communications, Email, APS.com, IVR
	Letter	 Personalized letter with customer information regarding upcoming transition and best rate analysis Sent via direct mail
	Smart Video	 Personalized smart video with customer information regarding upcoming transition and best rate analysis
	Social Media	 Leverage social media platforms to send TOU with demand and Shift, Stagger and Save messaging Monitor voice of the customer
0	Community Partnerships	Leverage community partnerships to educate on TOU with demand transition
	Mass Media	• Shift, Stagger and Save mass media campaign (radio, print, digital, podcast)
	Welcome Kit	 Interactive and personalized welcome kit introducing customers to their new TOU with demand rate plan



Transition and Beyond

Ongoing customer education



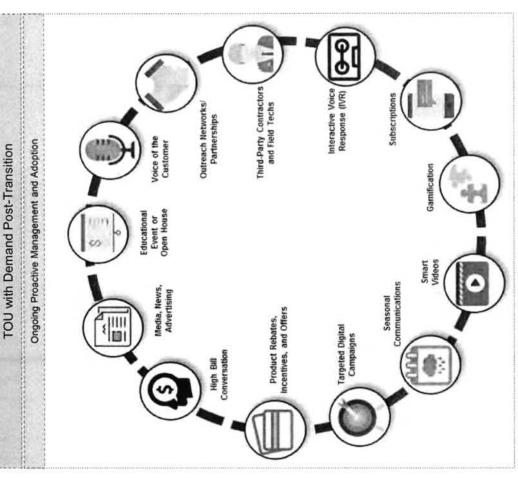




Transition and beyond phase

Phase objectives:

- Continue Shift, Stagger and Save messaging and incorporate outbound outreach as appropriate
- Reminders and savings tips before high heat and cooling seasons
- Encourage participation in programs, alerts and other service offerings
- Monitor customer feedback regarding recent transition experience







Transition and beyond phase - education and outreach

E&0	Beyond Transition
Seasonal Readiness	Seasonal tips to prepare for temperature changes
Proactive Communications	 Personalized communication triggered by usage behaviors. Activated in advance of potential high bill Provide list of actions customer can take to Shift, Stagger and Save
Mass Media	 Continue Shift, Stagger and Save mass media campaign (radio, print, digital)
Bill Communications	 Personalized bill messages and inserts explaining TOU with demand
Awareness & Transition Phase	 Continue education and outreach efforts from the awareness and transition phases with adjusted messaging to fit the post- transition phase



Summary

Our commitment:

- Create a seamless and transparent customer journey
- Leveraging the success of current rate plans and our customer's experience
- Create an awareness of TOU with demand rates for our customers, with the goal of leaving them feeling well informed
- Provide helpful tools and resources



Residential Rates and Changes Rate Design-Overview of





Rate Design Modernization

Focus Area	Current State	Rate Case Objective
Time-of-Use Rates (TOU)	 > 50% of residential customers are on a TOU rate On-peak hours from 12-7 PM (M-F) TOU difference in on-peak prices that are 4 times the off-peak prices 	 Most residential customers on a TOU rate On-peak hours from 3-8 PM (M-F) to better align with system peak TOU difference in on-peak prices that are 2 times the off-peak prices
Demand Rates	 11% of residential customers are on demand rates, more than any other electric utility 	 Most residential customers on demand rates Calculated on the highest demand averaged over a one-hour period during the on-peak period each month
Basic Service (Fixed) Charge	 Customers pay basic service charge ranging from \$8.67 - \$16.91 per month 	 Set basic service charge for all rate classes ranging from \$14 - \$24 per month
Net Metering	Excess power compensated at full retail price	 Excess power compensated at export price aligned with avoided cost Recovery of cost to purchase through existing PSA mechanism Grandfather qualified rooftop solar customers



Residential Rate Design

- Three Rate Options
- Extra Small Rate (<600kWh per month)
- On-peak hours 3-8 p.m. and four new off-peak holidays
- \$34/month credit (up to 80% of bill) for limited-income customers
- "Flat Bill" Option (not the same as equalizer)
- AMI meter opt-out fee
- Grandfather solar customers

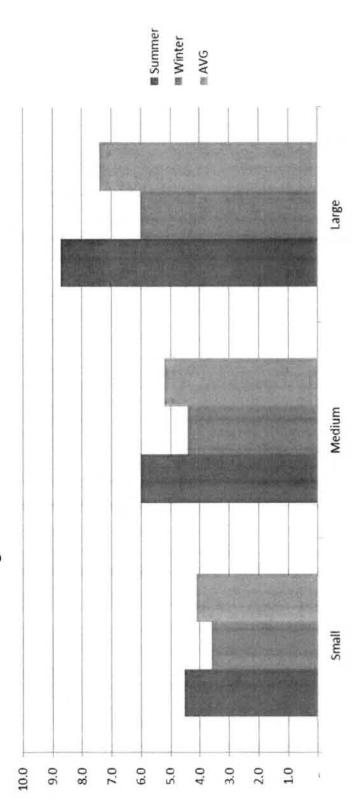
	Basic Service Charge (per month)	Demand Charge (\$/kW)	Summer Energy Charge (On/Off Peak \$/kWh)	Winter Energy Charge (On/Off Peak \$/kWh)
Extra Small*	\$18	None	\$0.10324	\$0.10324
R-1	\$24	\$6.60/kW	\$0.15160/\$0.08070	\$0.12730/\$0.08070
R-2	\$14.50	\$8.40/kW	\$0.15160/\$0.08080	\$0.12730/\$0.08080
R-3	\$24	\$16.40/kW summer \$11.50/kW winter	\$0.09090/\$0.05475	\$0.06670/\$0.05475





Residential Demand

By Home Size and Season Monthly Peak Usage (kW)



Small Home - 750 kWh per month Medium Home - 1100 kWh Large Home - 2050 kWh

On-peak only Noon to 7 pm 1- hour demand

Note: 96% of customer bills are under 10 kW demand

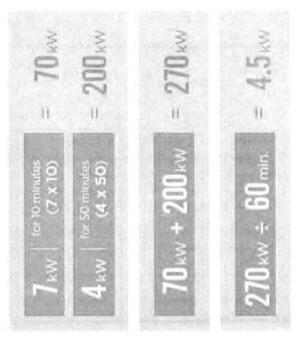


How is Average Demand Calculated?

Demand is averaged over an entire hour—not just one moment in time.

6:00 - 6:10pm - 7 kW - using the oven, dryer and AC at the same time 6:11 - 7:00pm - 4 kW - oven and dryer turned

The demand averaged over an hour is 4.5 kW





Extra Small Customer Bill Impacts

Average Energy & Demand - 450 kWh, 3 kW

		Customer	er Bill		
	Rate	Basic Service Charge	Energy Charge	Demand Charge	Total 2
Transitional Rate ¹ E-12	E-12	\$ 10	\$ 56	ř.	\$ 66
New Rate 3	R-XS	\$ 18	\$ 47	ï	\$ 65
Impact		8 \$	(6) \$	1	\$ (1)

¹ Transitional Rates incorporate current rate structure with requested rate increase

² Total amount reflects base rate charges only and excludes adjustor charges, taxes and fees

3 Best rate



Small Customer Bill Impacts Average Energy & Demand – 750 kWh, 4 kW

THE REAL PROPERTY.		Customer Bill	er Bill		
	Rate	Basic Service Charge	Energy Charge	Demand	Total ²
Transitional Rate ¹	E-12	\$10	\$101	r	\$111
Transitional Rate ¹	ET-2	\$20	\$92	ŞI.	\$112
New Rate 3	R-2	\$15	69\$	\$34	\$118
Impact	E-12 Impact	\$5	(\$32)	\$34	\$8
Impact	ET-2 Impact	(\$5)	(\$23)	\$34	\$6

¹ Transitional Rates incorporate current rate structure with requested rate increase

² Total amount reflects base rate charges only and excludes adjustor charges, taxes and fees

³ Best rate



Medium Customer Bill Impacts Average Energy & Demand – 1,100 kWh, 5 kW

		Customer Bill	er Bill		
	Rate	Basic Service Charge	Energy Charge	Demand Charge	Total ²
Transitional Rate 1	E-12	\$10	\$160		\$170
Transitional Rate 1	ET-2	\$20	\$134	ı	\$154
New Rate 3	R-1	\$24	\$102	\$33	\$159
Impact	E-12 Impact	\$14	(\$28)	\$33	(\$11)
Impact	ET-2 Impact	\$4	(\$32)	\$33	\$5

¹ Transitional Rates incorporate current rate structure with requested rate increase

² Total amount reflects base rate charges only and excludes adjustor charges, taxes and fees

³ Best rate



Large Customer Bill Impacts Average Energy & Demand – 2,050 kWh, 7 kW

Transitional					
Transitional	Section 2 sectio	Basic			
Transitional		Service	Energy	Demand	
Transitional	Rate	Charge	Charge	Charge	Total ²
Rate 1	ET-2	\$20	\$250		\$270
Transitional Rate ¹	ECT-2	\$20	\$127	66\$	\$246
New Rate 3	R-3	\$24	\$123	\$101	\$248
Impact	ET-2 Impact	\$4	(\$127)	\$101	(\$22)
Impact E0	ECT-2 Impact	\$4	(\$4)	\$3	\$3

¹ Transitional Rates incorporate current rate structure with requested rate increase

² Total amount reflects base rate charges only and excludes adjustor charges, taxes and fees

³ Best rate



Small Customer Bill Impact Sensitivities

E-12 Customers Billed on Best Rate	Wh Bill ET-2 E-12	\$122 \$11 \$12	\$118 \$6 \$8	\$114 \$2 \$3
E1-2 and E-12 custo	Demand kW Energy kW	4.5 750	4.0 750	3.5 750
	Load Factor	23%	792	78%



Medium Customer Bill Impact Sensitivities

Energy kWh Bill ET-2 E-12	1,100 \$165 \$11 (\$5)	1,100 \$159 \$5 (\$11)	1,100 \$152 (\$2) (\$18)
oad Factor Demand kW Ene	25% 6.0	30% 2.0	37% 4.0



Large Customer Bill Impact Sensitivities

				lmi	mpact
Load Factor	Demand kW	Energy kWh	Bill	ET-2	ECT-2
35%	8.0	2,050	\$262	(6\$)	\$3
40%	7.0	2,050	\$248	(\$22)	\$3
47%	6.0	2,050	\$233	(\$37)	\$2



Future Technical Conference

- Thursday, November 3rd, 2016 from 2:00-3:30pm
- Location Change: APS Learning Center
- Proposed Topics
- Adjustments and updates to APS's request and SFR's
- Discovery
- Dates and locations for settlement discussions